

## **REMARKS**

Reconsideration and further examination of the subject patent application in view of the RCE submitted herewith and in view of the present Amendment and the following Remarks is respectfully requested. Claims 1-27 are currently pending in the application. Claims 1-18 and 20-27 have been rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Claim 1-7, 10-16, and 19-25 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. Pub. No. 2002/0141404 to Wengrovitz in view of Foti (U.S. Pat. Pub. No. 2002/0194378). Claims 8, 17, and 26 have been rejected under 35 U.S.C. §103(a) as unpatentable over Wengrovitz in view of Foti, and further in view of U.S. Pat. Pub. No. 2004/0120502 to Strathmeyer et al. ("Strathmeyer") and claims 9, 18, and 27 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Wengrovitz in view of Foti, and further in view of U.S. Pat. No. 6,816,912 to Borella et al. ("Borella"). Claims 1, 2, 4, 5, 10, 11, 19, and 20 have been amended for clarification. After a careful review of the claims and cited references, it is believed that the claims are in allowable form and therefore a Notice of Allowance is respectfully requested.

Claims 1-18 and 20-27 have been rejected for insufficient antecedent for "the automatic call distributor system" in claims 1 and 10, and insufficient antecedent for "the automatic contact distributor" in claims 2, 11, and 20. These claims have been amended to clarify the antecedents such that claims 1-18 and 20-27 are now believed to be in allowable form. Claims 1, 10, and 19 have been amended for clarification, and claim 4 has been amended to recite modifying the INVITE in the first server and forwarding the modified INVITE (see e.g., paragraph 0027).

Wengrovitz describes a system and method for establishing SIP sessions between called

and calling endpoints in which a single server receives a SIP INVITE request and routes the session directly to the endpoint in the conventional manner after determining an address from caller information contained in the body portion of the SIP request header. This is entirely different from and contrary to the claimed system and method of routing a SIP call within an automatic call distribution system where the SIP call is forwarded from a first server and routed through a second server while concealing the address of the assigned agent from the caller to maintain anonymity of the agent. Foti describes a system for hiding the source address of an originating home network IP address by mapping the source address to an IP address of a Media Source Function within the home network and forwarding it to the destination home network.

All the independent claims 1, 10, and 19 concern a method/apparatus which sets up a SIP call, first directed to an ACD thru a first server, between one of a plurality of agents selected to handle the call by the ACD, and the caller through a buffer server which maintains anonymity of the agent by modifying the addresses of the agent SIP messages, and then passing them to the caller, while also passing caller SIP message to the agent.

Claims 1-7, 10-16, and 19-25 have been rejected as obvious over Wengrovitz and Foti. However, Wengrovitz only concerns conventional set-up of SIP calls directly between two endpoints using extra information in the SIP messages to route the call. As a result, Wengrovitz does not concern a call sent to an ACD thru the first server, and does not disclose selecting one of a plurality of agents; setting up the call between the selected agent and the caller after the ACD system receives the initial SIP message; or setting up the call through a second server or a buffer server. Wengrovitz merely describes a direct connection set up between one caller to a specified callee. Nor does Wengrovitz teach modifying the source address of the selected agent's

SIP messages by substituting that of the second or buffer server to thereby maintain anonymity of the agent.

The Office Action concedes that Wengrovitz does not teach modifying the source address of the SIP message from the agent, but asserts that Foti does in the abstract and paragraphs 0008, 0030, 0048, and 0049. However, Foti discloses a system of hiding the address of a single originating home terminal when a message is sent from the original terminal to a single destination terminal. The MRF described in Foti is not a second server, but is an entity located within a home network of a single home user (see paragraph 0028). Thus, Foti also does not concern the claimed ACD system in which the addresses of a plurality of agents are protected when an agent is assigned. Accordingly, Foti, as in Wengrovitz, also does not disclose a call first directed to an ACD thru a first server; does not disclose selecting one of a plurality of agents; does not disclose setting up a call with a selected agent, and the caller, or setting up the call through a second server. Nor does Foti teach modify the message received by the second server or the second server readdressing and forwarding messages to the agent. For example, in paragraphs 0048-49, the originating message is sent directly from Terminal A to the MRF-M1016 of Terminal B and passed thru with the source address unchanged (see paragraph 0048, lines 6-15). There is no ACD, no plural agents, and no second server, and thus no modifying or forwarding by a second server. Thus, the cited references taken together do not teach all the limitations of the independent claims 1, 10, and 19, and therefore, these claims are distinguishable over the cited references. In addition, the dependent claims 2-9, 11-18, and 20-27 are also distinguishable over the cited references because they depend from allowable independent claims 1, 10, and 19.

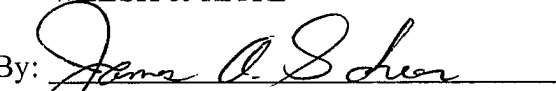
Claims 4-9, 13-18, and 22-27 are also further distinguishable because none of the cited references disclose the claimed modifications of the INVITE message, agent selection, or agent identifier as claimed.

For the foregoing reasons, applicant submits that the subject application and all pending claims 1-27 are in condition for allowance, and applicant earnestly solicits an early Notice of Allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

The Commissioner is hereby authorized to charge any additional fee which may be required for this application under 37 C.F.R. §§ 1.16-1.18, including but not limited to the issue fee, or credit any overpayment, to Deposit Account No. 23-0920. Should no proper amount be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal, or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 23-0920.

Respectfully submitted,

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Dated: February 25, 2010  
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